

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

IN RE: VALSARTAN PRODUCTS  
LIABILITY LITIGATION,

THIS DOCUMENT RELATES TO:

Economic Loss Plaintiff Mary McLean

MDL NO. 2875

HON. ROBERT B. KUGLER  
DISTRICT JUDGE

**SECOND AMENDED NOTICE OF VIDEOTAPED DEPOSITION OF  
MARY MCLEAN**

PLEASE TAKE NOTICE that, in accordance with Rule 30 of the Federal Rules of Civil Procedure and the Fact Witness Deposition Protocol in this case (Case Management Order #20, filed November 17, 2020 - Document 632), Defendants Teva Pharmaceuticals USA, Teva Pharmaceutical Industries Ltd., Actavis LLC, and Actavis Pharma, Inc. (collectively, "Teva") will take the deposition upon oral examination of Mary McLean, on **December 14, 2021, at 9:00 a.m. CT** and continuing until completion, **via remote deposition**. The witness, court reporter, and videographer will be located at Regus Center, 1545 Crossways Blvd., Suite 250, Chesapeake, VA 23320. The deposition will be videotaped and recorded stenographically, and will continue from day to day until completed before a person duly authorized to administer oaths who is not counsel of record or interested in the events of this case. Remote access using audio-visual conference technology will be available to permit counsel for the parties to participate from various, separate locations.

Additionally, in accordance with paragraph B(1) of C.M.O. 20 (Dkt. 632), notice is hereby given that the undersigned will be the lead questioning attorney during the deposition.

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Date: November 22, 2021

Respectfully submitted,

/s/ Gerond J. Lawrence

Gerond J. Lawrence

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*Attorney for Teva Pharmaceuticals USA, Inc.,  
Teva Pharmaceutical Industries Ltd., Actavis  
LLC, and Actavis Pharma, Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 22<sup>nd</sup> day of November 2021, I caused a true and correct copy of the foregoing Second Amended Notice of Videotaped Deposition of Mary McLean to be filed with the Court's ECF system and served upon counsel of record. I further certify that a copy of the foregoing was served on the Plaintiff's counsel by e-mail at stacy@bartonburrows.com, with a copy served on all parties via MDL Centrality. Per agreement by the parties, Plaintiff's counsel has agreed to serve a copy of the foregoing on Mary McLean via e-mail.

This 22<sup>nd</sup> day of November 2021.

/s/ Gerond J. Lawrence  
*Attorney for Teva Pharmaceuticals USA, Inc.,  
Teva Pharmaceutical Industries Ltd., Actavis  
LLC, and Actavis Pharma, Inc.*